

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JANE DOE	)	
	)	
<i>Plaintiff,</i>	)	
	)	Case No. 23-cv-14303
v.	)	
	)	
ANTHONY'S PIZZA HOLDING	)	
COMPANY, LLC d/b/a ANTHONY'S	)	Judge John F. Kness
COAL FIRED PIZZA	)	
	)	Magistrate Judge M. David Weisman
	)	
and	)	
	)	
ANTHONY RODRIGUEZ,	)	
	)	
<i>Defendants.</i>	)	
	)	

**PLAINTIFF'S MOTION TO PROCEED UNDER A PSEUDONYM**

NOW COMES Plaintiff Jane Doe, by and through her attorneys, Legal Aid Chicago, and moves for leave to proceed under the pseudonym Jane Doe.

1. The Complaint in this matter (Doc. #1) contains a lengthy factual background describing in detail Ms. Doe's experience of sexual harassment and sexual assault, which culminated in two rapes.

2. The Seventh Circuit has long recognized that "fictitious names are allowed when necessary to protect the privacy of children, rape victims, and other particularly vulnerable parties or witnesses." *Doe v. Blue Cross & Blue Shield United*, 112 F.3d 869, 872 (7th Cir. 1997); *see also Doe v. Vill. Of Deerfield*, 819 F.3d 372, 377 (7th Cir. 2016).

3. As set out in detail in Ms. Doe's Memorandum of Law, filed herewith, the facts and circumstances of this case amply warrant granting her leave to proceed under a pseudonym.

4. Doing so is necessary to protect her privacy as a rape victim. The alternative would serve to embarrass, punish and stigmatize her, solely based upon her status as a rape victim.

WHEREFORE, Plaintiff respectfully requests that this Court enter an Order permitting her to proceed with this action anonymously, under the pseudonym Jane Doe.

Dated: December 28, 2023

Respectfully submitted,  
Plaintiff Jane Doe

/s/ Joseph Garcia

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 28, 2023, I electronically filed the foregoing **PLAINTIFF'S MOTION TO PROCEED UNDER A PSEYDONYM** herein with the Clerk of the United States District Court, Northern District of Illinois, Eastern Division, using the CM/ECF system, which sent notification of such filing to the registered CM/ECF participants.

/s/ Joseph Garcia

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